

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND, NORTHERN DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**

Plaintiff,

and

KATHY KOCH,

Intervenor/Plaintiff,

V.

LA WEIGHT LOSS CENTERS, INC.,

Defendant.

CASE NO.: WDQ 02-CV-648

JURY DEMANDED

JOINT MOTION TO EXTEND EXPERT DISCOVERY AND MODIFY SCHEDULE

Pursuant to the Court’s October 2, 2006, Letter Order, the Federal Rules of Civil Procedure, Rule 105 of the Local Rules of the United States District Court for the District of Maryland and the Court’s May 25, 2004, Order Regarding Bifurcation and Scheduling (the “Order”), plaintiff EEOC and defendant LA Weight Loss Centers, Inc. (the “Parties”) respectfully request that the Court enter a limited order extending the Parties’ time for expert discovery and adjusting the deadlines for dispositive motions accordingly.

Specifically, the Parties request that the Order be modified as follows: (1) EEOC shall submit its rebuttal to LA Weight Loss Centers, Inc.'s expert, David Jones, Ph.D., on or before October 30, 2006¹; (2) expert discovery shall conclude on or before January 5, 2007; (3) the Parties' Rule 26(e) disclosures shall be submitted on or before January 5, 2007; (4) dispositive motions with respect to Stage I issues shall be filed on or before February 2, 2007; and (4) EEOC

¹ The parties again ask the Court to extend the deadline for this rebuttal because of unanticipated logistical problems with delivery of electronic data pursuant to Rule 26(a)(2)(B).

shall file its opposition and cross motion, if any, on or before March 5, 2007.

/s/

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Dated: October 19, 2006